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February 3, 2021

**VIA ECF**

The Honorable Ashely M. Chan, U.S.B.J.  
United States Bankruptcy Court for the Eastern District of Pennsylvania  
Robert N.C. Nix Sr. Federal Courthouse  
900 Market Street, Suite 204  
Philadelphia, Pennsylvania 19107

**Re: *In Re: Vascular Access Centers, L.P.*  
Bankr. Case No. 19-17117  
Withdrawal of Stay Enforcement Motion Against Dr. David Cohen**

Dear Judge Chan:

This firm represents Stephen V. Falanga, Chapter 11 Trustee (the “Trustee”) for the bankruptcy estate of the debtor, Vascular Access Centers, L.P. (the “Debtor”), in connection with the above-referenced case.

On June 8, 2020, the Trustee filed a *Motion for An Order Enforcing the Automatic Stay as to Actions Against the Debtor’s Non-Debtor Subsidiary Limited Liability Companies and Philadelphia Vascular Institute Pursuant to 11 U.S.C. §§ 362(a) and 105(a) or, Alternatively, Extending the Stay Pursuant to 11 U.S.C. § 105(a)* (the “Stay Enforcement Motion”) [D.E. # 385].

On September 8, 2020, the Court entered an Order enforcing the automatic stay as against the parties enumerated therein [D.E. # 513]. Drs. Salil S. Joshi (“Joshi”), Jorge A. Salazar (“Salazar”) and David B. Cohen (“Cohen”) objected to the Trustee’s Motion and were excluded from the Order to afford the parties time to continue discussions in resolution of the Motion as it pertained to Drs. Joshi, Salazar and Cohen.

Further to my correspondence with Your Honor’s Chambers, Dr. Cohen has left his position and is no longer affiliated with the Debtor’s subsidiaries. As such, the Trustee hereby withdraws the Stay Enforcement Motion with respect to Dr. Cohen without prejudice. The Trustee otherwise reserves all rights and remedies.

The Stay Enforcement Motion has been adjourned to February 17, 2021 at 12:30 p.m. with respect to Drs. Joshi and Salazar.

Honorable Ashely M. Chan, U.S.B.J.

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We thank the Court for its attention to this matter. If Your Honor has any questions or requires anything further, we are always available.

Respectfully submitted,



Christopher M. Hemrick  
(*Admitted Pro Hac Vice*)

cc: All counsel of record (via ECF).